



Comments to FCC regarding regulations governing unsolicited fax advertisements

Submitted by:
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The World Batch Forum is an international trade association serving firms and individuals practicing batch process manufacturing. The Forum's mission is to upgrade the standards of the industry through education and information dissemination.

The removal of the "established business relationship" qualification from the existing fax regulations is a threat to our association. It appears we will be forced to obtain written consent from our members, sponsors and other industry partners before transmitting any fax that could be construed as being commercial in nature. This would represent a significant expenditure of time and money, which in our view would be better spent serving members.

We understand the entire association community has raised concerns about the new regulations. We share these concerns, and have many questions.

- Would a fax communication announcing the association's annual membership convention (and soliciting registration) be considered commercial in nature?
- How about a fax announcement of an upcoming educational seminar?
- Would international members be subject to these rules?
- Would a written consent form expire with membership expiration?
- What constitutes consent; is a signature on a membership application adequate?

Our association, as do virtually all associations, views fax communications as a vital tool to serve members and accomplish the organization's goals.

We urge your consideration of the negative impact of these regulations on the association community and ask that they not be put into effect.

Thank you.